



**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Elias Kifle,

Pro se Plaintiff,

v.

X Corp., YouTube, LLC, Meta
Platforms, Inc., Shimeles Legese,
Yeshi Wondimu, Wondwossen Teklu
Woldhan, Abebe Tola, John Doe 1,
John Doe 2,

Defendants.

Civil Action No.:

1:24-CV-2082

Jury Trial Demanded

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Pro Se Plaintiff Elias Kifle ("Plaintiff") files this Verified Complaint for Damages and Injunctive Relief, showing the Court as follows:

NATURE OF THE ACTION

1. This is a civil action for damages and injunctive relief brought by Plaintiff arising out of defamatory statements published by Defendants on various internet platforms, including YouTube, Facebook, X (formerly Twitter), and Telegram, which have caused significant harm to Plaintiff's reputation and personal life.

JURISDICTION AND VENUE

2. Jurisdiction is proper in this court under 28 U.S.C. § 1332 as there is complete diversity of citizenship between Plaintiff and Defendants and the amount in controversy exceeds \$75,000.

3. The actions upon which the allegations in this Complaint are based include the publication of defamatory statements via internet platforms such as YouTube, Facebook, X (formerly Twitter), and Telegram, which are accessible and were accessed within this judicial district. These platforms disseminated the alleged defamatory statements widely within this district, thus affecting Plaintiff herein.

4. Venue is proper in this district under 28 U.S.C. § 1391 because a substantial part of the events or omissions giving rise to the claims occurred in this district.

5. Therefore, Plaintiff is informed and believes, and on that basis alleges, that jurisdiction and venue are proper in this Court.

PARTIES

6. Plaintiff is an individual residing in the State of Georgia. He is a private individual who does not seek public attention or the limelight. His involvement in

this action stems solely from his need to address the significant harm caused to his personal and professional reputation due to Defendants' actions.

7. Defendant YouTube, LLC (“YouTube”) is a company incorporated in Delaware with its principal place of business in California.

8. Defendant Abebe Tola (“Tola”) is an individual believed to reside in the United Kingdom.

9. Defendant Meta Platforms, Inc., (“Meta”) is a company incorporated in Delaware with its principal place of business in California. It operates several online platforms, including Facebook and WhatsApp.

10. Defendant Wondwossen Teklu Woldhan (“Wondwossen Teklu”) is an individual believed to reside in Kampala, Uganda, as a refugee.

11. Defendant X Corp (“X Corp”) is a company incorporated in Delaware with its principal place of business in California.

12. Defendant Yeshi Wondimu (“Wondimu”) is an individual believed to reside in the State of Maryland.

13. Defendant Shimelis Legese (“Legese”) is an individual believed to reside in the State of Virginia.

14. Defendant John Doe 1 is an individual believed to be using the Twitter handle @Wodajek and his/her real identity and residence are unknown at this time. Plaintiff suspects that his real name might be Wodaje Yimam Kinfu.

15. Defendant John Doe 2 is an individual believed to be using the Facebook profile ID: 100014126017674 and his user name is “Dave Dawit.” His/her real identity and residence are unknown at this time.

FACTUAL ALLEGATIONS

16. On March 14, 2024, Legese published false and defamatory statements about Plaintiff on Meta Platforms’ Facebook and in a WhatsApp group falsely alleging that Plaintiff intends to misappropriate funds from the Shewa Amhara Relief Fundraiser. (**Exhibit 1**).

17. On March 18, 2024, Tola published a video on YouTube containing false and damaging assertions about Plaintiff, specifically accusing Plaintiff of endangering the lives of journalists in Ethiopia. (**Exhibit 2**).

18. On May 6, 8, and 11, 2024, Wondwossen Teklu published false and defamatory statements about Plaintiff on his Facebook page, WhatsApp group, and

a Telegram page he manages named “Gasha Media.” Wondwossen Teklu falsely alleged that Plaintiff is actively working as an agent of the Abiy Ahmed government in Ethiopia and is involved in stealing funds from various organizations. Additionally, Wondwossen Teklu disclosed a fabricated tax record, further violating Plaintiff's privacy. (**Exhibits 3, 4, and 9.**)

19. On May 9, 2024, Wondimu falsely accused Plaintiff of collaborating with Eritrean secessionists and threatened to disclose personal information about him. (**Exhibit 5**). Demonstrating a coordinated effort to defame Plaintiff, on May 12, 2024, Wondimu further circulated Wondwossen Teklu's defamatory statements on her Facebook page, amplifying the damage to Plaintiff's reputation. (**Exhibit 8**)

20. On March 29 and May 11, 2024, Defendant John Doe 1 published false and defamatory statements about Plaintiff on X (formerly Twitter), falsely alleging that Plaintiff is engaged in blackmailing various individuals and threatening to disclose personal information about him. (**Exhibit 6**).

21. On February 28, 2024, John Doe 2 vilified Plaintiff by publishing a defamatory statement on his Facebook page, wherein he referred to Plaintiff as a “monster” (“ጭረቅ” in Amharic), a term that connotes extreme malevolence and poses a severe detriment to Plaintiff's reputation. (**Exhibit 7**).

22. Upon information and belief, John Doe 1, Wondimu, Wondwossen Teklu, and Legese work collaboratively under an organization named the Amhara

Fano Popular Army (“ሰራዊት” in Amharic) and appear to be coordinating their campaign of harassment against Plaintiff.

23. Plaintiff has demanded the removal of these defamatory statements from the platforms of Defendants X Corp, YouTube, and Meta Platforms. However, these requests have not been complied with, exacerbating the harm to Plaintiff.

24. Plaintiff has attempted to send cease and desist letters to John Doe 1, John Doe 2, Abebe Tola, Yeshe Wondimu, Shimeles Legese, and Wondwossen Teklu Woldhan, but has been unable to obtain their addresses from X Corp, Meta Platforms, and YouTube without a court subpoena.

25. Plaintiff has suffered general and special damages in an amount to be proven at trial.

FIRST CAUSE OF ACTION

Defamation - Against Defendants Legese, Tola, Wondwossen Teklu, Wondimu, John Doe 1, and John Doe 2

26. All of the allegations contained within the other sections above and below are hereby incorporated by reference as if fully set out herein.

27. Plaintiff is a private person.

28. Plaintiff alleges that Defendants Legese, Tola, Wondwossen Teklu, Wondimu, John Doe 1, and John Doe 2 have each published false and defamatory statements about Plaintiff. These statements have variously accused Plaintiff of misappropriating funds, endangering journalists, being an agent of the Ethiopian government, collaborating with Eritrean secessionists, and engaging in blackmail. These publications have significantly harmed Plaintiff's reputation and standing within the community.

29. Plaintiff's tax record, which Wondwossen Teklu fabricated, and John Doe 1 and Wondimu amplified, is not a public controversy.

30. Defendants communicated the false statements to third parties via the Internet, which were accessible to third parties without password protection.

31. Defendants intentionally and purposefully caused the false statements to be republished by third parties in whole or in part.

32. In making and publishing, as well as continuing to publish, the false statements, Defendants knew the false statements were false or acted in reckless disregard as to the falsity of the false statements.

33. As a direct and proximate result of Defendants posting and continuing to publish the false statements, Plaintiff has sustained and will continue to sustain, immediate and irreparable harm and injury including, but not limited to, damage to

reputation, losses in revenues, loss of profits, loss of goodwill, loss of business relations with existing and future business prospects, and loss of competitive business advantage, opportunity, and/or expectancy.

34. As a direct and proximate result of Defendants posting and continuing to publish the false statements, Plaintiff has suffered and will continue to suffer humiliation, extreme emotional distress, anxiety, depression, headaches, lack of sleep, emotional pain and suffering, and anguish.

35. In publishing and continuing to publish the false statements, Defendants acted maliciously, unlawfully, and with conscious disregard for Plaintiff's rights.

36. Plaintiff's injuries were intensified by the malicious conducts of Defendants, and Defendants' conduct justifies an award of exemplary and punitive damages pursuant to O.C.G.A. § 51-12-5.1

SECOND CAUSE OF ACTION

Civil Conspiracy - Against Defendants Legese, Wondwossen Teklu, Wondimu, and John Doe 1

37. Plaintiff asserts that Defendants, by their coordinated efforts under the umbrella of the Amhara Fano Popular Army, have engaged in a civil conspiracy to defame and harass Plaintiff, resulting in a sustained campaign of defamation and threats to his personal security and privacy.

THIRD CAUSE OF ACTION

Invasion of Privacy - Against Defendants Wondimu, Wondwossen Teklu, and John Doe 1

38. Plaintiff alleges that Defendants have threatened to and/or disclosed private information about Plaintiff without his consent, thereby infringing upon his privacy, placing him at further risk of harm, and causing him to be portrayed in a false light.

39. Defendants intentionally published false statements to third parties via the Internet. Defendants' false statements are and would be highly offensive to a reasonable person and have been widely published to third parties.

40. In making and publishing, as well as continuing to publish, the false Statements, Defendants knew the false statements were false or acted in reckless disregard as to the falsity of the False Statements.

41. As a direct and proximate result of Defendants posting and continuing to publish the false statements, Plaintiff has suffered and will continue to suffer extreme emotional distress, anxiety, depression, headaches, lack of sleep, emotional pain and suffering, and anguish.

42. Defendants' acts, omissions, conduct, and transactions alleged herein were intentional and done willfully and maliciously toward Plaintiff, and with

conscious disregard for Plaintiff's rights. Plaintiff's injuries were intensified by the malicious conduct of Defendants, and Defendants' conduct justifies an award of exemplary and punitive damages pursuant to O.C.G.A. § 51-12-5.1.

FOURTH CAUSE OF ACTION

Negligence - Against X Corp, YouTube, and Meta Platforms

43. Plaintiff alleges that Defendants X Corp, YouTube, and Meta have acted negligently by failing to remove defamatory content posted on their platforms despite being aware of its false nature and the harm it is causing to Plaintiff. This negligence has perpetuated the harm to Plaintiff's reputation.

RELIEF SOUGHT

Plaintiff respectfully requests the following relief from this honorable court:

1. **Compensatory Damages:** For the injuries suffered to Plaintiff's reputation, mental health, and personal and professional relationships due to Defendants' defamatory statements and actions.
2. **Punitive Damages:** To punish Defendants for their willful, malicious, and coordinated actions that have egregiously violated Plaintiff's rights, and to deter similar conduct in the future.

3. **Injunctive Relief:** An order requiring Defendants X Corp, YouTube, and Meta Platforms to immediately remove the defamatory content from their platforms and to prohibit further publication of such content.
4. **Declaratory Relief:** A declaration that the statements made by the Defendants are false and defamatory.
5. **Disclosure Order:** An order compelling X Corp, YouTube, and Meta Platforms to disclose the contact information of Defendants Shimeles Legese, Abe Tola, Yeshe Wondimu, and Wondwossen Teklu Woldhan, John Doe 1, and John Doe 2 to enable service of process.
6. **Costs and Attorney's Fees:** An order for the recovery of all costs incurred by Plaintiff in connection with this action.
7. Such other and further relief as the court deems just and proper.

Dated: May 13, 2024

Respectfully submitted.

Elias Kifle, *Pro se* Plaintiff

/s/ Elias Kifle

Signature of Plaintiff

Elias Kifle

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Lawrenceville GA 30044

Email: eliaskifle@gmail.com

Tel: 770 296 2095

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AFFIDAVIT OF ELIAS KIFLE

I, Elias Kifle, under penalty of perjury and pursuant to 28 U.S.C. § 1746, declare and state the following:

1. I am the Plaintiff in the above-entitled action. I am over the age of eighteen years and am competent to testify to the matters stated herein. I am a resident of the State of Georgia.

2. This action is brought to address significant harm caused to my reputation and personal life due to defamatory statements published by the Defendants on various internet platforms including YouTube, Facebook, and X (formerly Twitter).

3. I believe that jurisdiction and venue are properly vested in this court under 28 U.S.C. §§ 1332 and 1391 because there is complete diversity of citizenship between myself and all Defendants, and the amount in controversy

exceeds \$75,000. The defamatory actions, which give rise to these claims, occurred within this judicial district, and the harmful content was accessed and disseminated widely here.

4. Each Defendant as named in this action has been involved in the publication of false statements that have damaged my personal and professional reputation. These Defendants include corporate entities with principal places of business listed and individuals whose actions directly affected me from various global locations as detailed in the complaint.

5. On multiple specific dates, Defendants published or caused to be published false statements about me. These included accusations of criminal behavior, unethical acts, and other falsehoods that have no basis in truth. Examples include, but are not limited to:

- On March 14 and 18, April 6, 8, and 11, and May 9 and 12, 2024, false and damaging assertions were made by Defendants on widely accessible internet platforms.
- Specific instances involve Defendants like Shimeles Legese, Wondwossen Teklu Woldhan, and Yeshe Wondimu making public claims and sharing content that egregiously misrepresented my actions and character.

6. As a direct result of these defamatory publications, I have sustained substantial damages including loss of reputation, emotional distress, anxiety, and financial losses due to diminished professional and business opportunities.

7. Based on the above allegations, I assert claims for Defamation, Civil Conspiracy, Invasion of Privacy, Negligence, and Intentional Infliction of Emotional Distress.

8. I request compensatory and punitive damages, injunctive and declaratory relief, disclosure orders, recovery of costs and attorney's fees, and any other relief deemed just and proper by the court.

I affirm that the statements made herein are true and correct to the best of my knowledge, understanding, and belief, and this affidavit is executed on the basis that false statements made are punishable under the law of perjury.

Dated: May 13, 2024

Respectfully submitted.

Elias Kifle, *Pro se* Plaintiff

/s/ Elias Kifle

Signature of Plaintiff

Elias Kifle

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Tel: 770 296 2095

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EXHIBITS